

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

KENNETH J. SAMANSKY
xxx-xx-8594
3001 N. Trinity
Denton, TX 76208

DEBTOR

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CASE NO.13-41306
CHAPTER 13

**DEBTOR'S MOTION TO SELL REAL ESTATE FREE AND CLEAR OF LIENS
PURSUANT TO 11 U.S.C. §363(f)**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN THIRTEEN (13) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUESTS FOR HEARING. THE COURT WILL THEREAFTER SET A HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Kenneth J. Samansky , Debtor, by and through his attorney for record, Robert E. Barron of Barron and Barron, LLP and files this Motion to Sell Real Estate Free and Clear of Liens Pursuant to 11 U.S.C. §363(f) and respectfully represent to this Court the following:

1. The Debtor filed this Chapter 13 case on May 22, 2013.
2. The Debtor's Chapter 13 Plan was confirmed on August 28, 2013..
3. The Debtor is current in his Chapter 13 Plan payments.
4. The Debtor desires to sell his homestead located at 3001 N. Trinity Road N., Denton,

Texas 76208. Debtor's schedules claimed his property as exempt under 11 U.S.C. § 522(d)(1) and valued same at \$152,740.00.

5. The proposed purchasers of the property are: James J. Travell, Sr. and Marie A. Travell

6. The proposed purchase price is \$157,500.00. The estimated closing cost are the usual and customary closing costs including real estate commissions.

7. The following parties claim an interest in the referenced property:

- a. Bank of America, N.A
Mackie Wolf Zientz & Mann, P.C.
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254
Interest: 1st Lien - PMSI
Amount: \$134,000.00
- b. Denton County
P.O. Box 90223
Denton, Texas 76202-5223
Interest: Property Taxes

8. Debtor desires this property to be sold and the net proceeds paid over to Kenneth J. Samansky.

DATED: June 13, 2014

Respectfully submitted,
BARRON & BARRON, L.L.P
P. O. BOX 1347
NEDERLAND, TEXAS 77627
(409) 727-0073

BY: /s/ Robert E. Barron
ROBERT E. BARRON
TBA NO. 01820800

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 13, 2014, a true and correct copy of the foregoing Motion to Sell Real Estate Free and Clear of Liens Pursuant to 11 U.S.C. §363(f) shall be served via electronic means, if available, otherwise by regular, first class mail, to the following and the attached mailing matrix:

Bank of America, N.A.
Chelsea Marie Schneider
Mackie Wolf Zientz & Mann, P.C.
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254

Stephen Wu
Mackie, Wolf, Zientz and Mann
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254

Michael Zientz
Mackie Wolf & Zientz, P.C.
14160 N. Dallas Parkway, Suite 900
Dallas, TX 75254

Janna L. Countryman
P. O. Box 941166
Plano, TX 75094-1166

Kenneth J. Samansky
P.O. Box 1551
Denton, TX 76202

Toyota Motor Credit Corporation
Stephen G. Wilcox
Bassel & Wilcox P.L.L.C.
P.O. Box 11509
Fort Worth, TX 76110-0509

Denton County
P.O. Box 90223
Denton, Texas 76202-5223

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702

/s/ Robert E. Barron

ROBERT E. BARRON

Label Matrix for local noticing

0540-4

Case 13-41306

Eastern District of Texas

Sherman

Fri Jun 13 16:21:26 CDT 2014

Ace Cash

8010 Spring Valley Road

Dallas, TX 75240-3848

ASSET ACCEPTANCE LLC

PO BOX 2036

WARREN, MI 48090-2036

Affiliated Pathologists

POB 1867

Denton, TX 76202-1867

AT & T

c/o AFNI, Inc.

POB 3517

Bloomington, IL 61702-3517

Affiliated Pathologists

c/o Credit Systems

POB 1088

Arlington, TX 76004-1088

Asset Acceptance

POB 1630

Warren, MI 48090-1630

Atmos Energy

P.O. Box 790311

Saint Louis, MO 63179-0311

Bank of America

7105 Corporate Dr.

Plano, TX 75024-4100

Bank of America, N.A.

4500 PARK GRANADA

CALABASAS, CA 91302-1613

Bankcard Services

POB 4477

Beaverton, OR 97076-4401

Robert E. Barron

P.O. Box 1347

Nederland, TX 77627-1347

Barron & Barron, LLP

P.O. Box 1347

Nederland, Texas 77627-1347

Baylor Medical Center

5601 Warren Pkwy.

Frisco, TX 75034-4069

Baylor Medical Center

c/o MNET Financial

95 Argonaut #280

Aliso Viejo, CA 92656-4140

Baylor Medical Ctr

PO Box 951970

Dallas, TX 75395-1970

Baylor Medical Ctr.

c/o DRS Collections

800 E. Campbell #399

Richardson, TX 75081-1862

Baylor Medical-Carrollton

c/o Creditors Bankruptcy Service

P.O. Box 740933

Dallas, TX 75374-0933

Big D Lumber

301 S. Interurban St.

Richardson, TX 75081-4183

Bluegreen Corp

4960 Conference Way

Boca Raton, FL 33431-4413

COSERV

C/O Credit Systems Intl.

1277 Country Club Ln.

Fort Worth, TX 76112-2304

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

Cavalry Portfolio Services

500 Summit Lake Drive, Ste 400

Valhalla, NY 10595-2322

Central Financial Control

PO Box 66051

Anaheim, CA 92816-6051

Chase

POB 15298

Wilmington, DE 19850-5298

Chase

c/o Midland Funding

8875 Aero Dr. Ste. 200

San Diego, CA 92123-2255

Chase

c/o Northstat Location Services

4285 Genesee St.

Cheektowaga, NY 14225-1943

Citi Shell

PO Box 6497

Sioux Falls, SD 57117-6497

Citibank

c/o FCF Services

PO Box 5629

Clearwater, FL 33758-5629

Citifinancial

605 Mann Road

Fort Mill, SC 29715-8421

Janna L. Countryman
P. O. Box 941166
Plano, TX 75094-1166

Janna L. Countryman
PO Box 941166
Plano, TX 75094-1166

Document
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Credit Protection
13355 Noel Rd. 21st Floor
Dallas, TX 75240-6837

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Discover
c/o Capital Mgmt
726 Exchange St. #700
Buffalo, NY 14210-1464

EZ Shop #5
10550 Walnut St.
Dallas, TX 75243-5346

Enhanced Recovery
8014 Bayberry Rd.
Jacksonville, FL 32256-7412

First Convenience Bank
POB 937
Killeen, TX 76540-0937

Floors Unlimited
10771 Estate Ln.
Dallas, TX 75238-2338

HSBC
P.O. Box 5253
Carol Stream, IL 60197-5253

HSBC
c/o Regent & Assoc.
2650 Fountain View Dr.
Houston, TX 77057-7631

Home Depot
c/o LTD Fiancial
7322 Southwest Fwy Ste 1
Houston, TX 77074-2010

Home Pro
1325 Capital Pkwy. Ste 117
Carrollton, TX 75006-3645

Hyphen Solutions
c/o Virtuoso Sourcing Group
3033 S. Parker Rd. Ste. 1000
Aurora, CO 80014-2919

IRS
P O Box 7346
Philadelphia, PA 19101-7346

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Jefferson Capital Systems
16 McLeland
Saint Cloud, MN 56303-2160

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Joseph Fletcher MD
3327 Colorado Blvd. #100
Denton, TX 76210-6866

Joseph Fletcher MD
c/o DIF Services
PO Box 29818
Dallas, TX 75229-0818

Kwal Paint
6300 Independence Pkwy #E
Plano, TX 75023-4021

Laboratory Corp of America
POB 2240
Burlington, NC 27216-2240

Maryland National Bank
225 N. Calvert St.
Baltimore, MD 21202-3504

Maxima Construction
po Box 978
Allen, TX 75013-0016

Medical Center of Lewisville
c/o Financial Corp of America
PO Box 203500
Austin, TX 78720-3500

Medical Imaging of Dallas
POB 814129
Dallas, TX 75381-4129

NTTA
P.O. Box 660244
Dallas, TX 75266-0244

Northern Resolution
P.O. Box 566
Amherst, NY 14226-0566

Pittsburg Paint
5500 Corporate Dr.
Pittsburgh, PA 15237-5848

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Kenneth J. Samansky
P.O. Box 1551
Denton, TX 76202-1551

Sandra Owen
5532 Big River Dr.
The Colony, TX 75056-3778

Chelsea Marie Schneider
Mackie Wolf Zientz & Mann, P.C.
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254-4314

Service King Frisco
8861 West Main St.
Frisco, TX 75034-3082

Southwest Credit Systems
4120 International Pkwy. Ste 1100
Carrollton, TX 75007-1958

TXU
PO Box 650700
Dallas, TX 75265-0700

(p)TXU ENERGY RETAIL COMPANY LP
CO BANKRUPTCY DEPARTMENT
PO BOX 650393
DALLAS TX 75265-0393

Texas Radiology
c/o Synerprise Consulting
POB 957
Mission, KS 66201-0957

Texas Workforce Commission
101 E. 15th St.
Austin, TX 78778-0001

Title Max
501 N. Interstate 35E Frontage Rd
Denton, TX 76206

Touchstone of Oaktree
1435 S. Loop 288 #101
Denton, TX 76205-4701

Touchstone of Oaktree
c/o Professional Finance
5754 W. 11th Ste 100
Greeley, CO 80634-4811

(p)TOYOTA MOTOR CREDIT CORPORATION
PO BOX 8026
CEDAR RAPIDS IA 52408-8026

Toyota Motor Credit Corporation (TMCC)
PO BOX 8026
Cedar Rapids, Iowa 52408-8026

Trinity Medical Center
c/o Central Financial
POB 8309B
Birmingham, AL 35218

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

U.S. Attorney General
Main Justice Building
10th and Constitution Ave NW
Washington, DC 20530-0001

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231

United States Attorney's Office
110 North College Ave., Ste 700
Tyler, Texas 75702-0204

Verizon
POB 920041
Dallas, TX 75392-0041

Washington Mutual
c/o Equinox Collection
5807 S. Garrett Rd. Ste 'L'
Tulsa, OK 74146-6824

Wells Fargo
c/o Asset Acceptance
PO Box 1630
Warren, MI 48090-1630

Wells Fargo Bank N A
Wells Fargo Education Financial Services
301 E 58th Street N
Sioux Falls SD 57104-0422

West Asset Management
2703 N. Highway 75
Sherman, TX 75090-2567

West Asset Management
c/o Denton Regional
PO Box 740782
Cincinnati, OH 45274-0782

Stephen G. Wilcox
Bassel & Wilcox P.L.L.C.
P.O. Box 11509
Fort Worth, TX 76110-0509

Stephen Wu
Mackie, Wolf, Zientz and Mann
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254-4314

Michael Zientz
Mackie Wolf & Zientz, P.C.
14160 N. Dallas Parkway, Suite 900
Dallas, TX 75254-4314

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One
PO Box 85520
Richmond, VA 23285

Discover
POB 15316
Wilmington, DE 19850

Internal Revenue Service
POB 21126
Philadelphia, PA 19114

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

TXU Energy
200 W. John Carpenter Fwy.
Irving, TX 75039

(d)TXU Energy
P.O. Box 650638
Dallas, TX 75265

Toyota Financial Services
P.O. Box 5855
Carol Stream, IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bank of America, N.A.

(d)Janna L. Countryman
P. O. Box 941166
Plano, TX 75094-1166

(u)Toyota Motor Credit Corporation

End of Label Matrix
Mailable recipients 87
Bypassed recipients 3
Total 90